

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd #208971  
Plaintiff

VS

Dr. Darbouze et. al.,  
Defendants

RECEIVED

2007 MAR 20 A 9:53

Case NO: 2:06 CV-511-201420

U.S. P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Motion For Good Cause To Obtain leave of

~~THE COURT Pursuant to Rule 30(a)(2) Fed. R. Civ.~~

Comes Now, The plaintiff, Courtney Boyd, moves  
into this Honorable Court Pursuant to Rule 30(a)(2) Fed.  
R. Civ. Proc. The Plaintiff submit the following in support:

- (1). The plaintiff filed a Complaint on 6-06-06 against  
the above Defendants for violating his 8th & 14th Amendment.
- (2) Rule 30(a)(2) A party must obtain leave of Court,  
which shall be granted to the extent consistent with the  
principles stated in Rule 26(b)(2). If the person to be examined  
is prison or if without the written stipulation of the parties.
- (3) The plaintiff have Dunn, King & Associates ~~and~~ <sup>at</sup> 2800  
Zelda Road, Suite 100-2, Montgomery, AL 36106, said that they  
will call of the depositions if I get an ~~order~~ Order that the Costs will  
be Covered through the Court system.

page 1

4. The plaintiff request that he be grant leave, and an Order  
Dunn, King & Associates L.L.C. Can take the depositions he  
want. So that he may have the defendant under oath for their  
testimony at the trial of this case which was filed 11/02/06,  
which was filed while the plaintiff was in lock up, which has not  
been over on.

5. The plaintiff will forward this Court and Dunn, King &  
Associates, and the Defendant Counsel once leave is granted,  
and a Court Order is sent to Dunn & King & Associates, ERM  
Owner, Mr. Pat Higgins.

6. The plaintiff request a deposition of the following people:  
The Defendants Jean Darbouze, MD., Kay Wilson R.N., H.S.A.,  
and Cynthia Zumbles, R.N., Paul Corbier MD, at Stetson  
Corr. Fac HCU, Officer ~~Whitehead~~ Whitehead, Dr. Corbier, and  
Officer Whitehead will be called as witnesses because both have  
knowledge of the case at hand. Also any witnesses called by the  
Defendant.

Wherefore, The plaintiff prays that this Honorable Court  
~~grant~~ grant him leave and order the deposition of the above  
people.

Courtney ~~Whitehead~~

### Certificate OF Service

I hereby Certify that I have served a copy of ~~the~~ filing  
upon Defendant Counsel, by placing it into Easterling Corr. Fac.  
on March 19, 2007.

*Cathy J. Bly*

*Page 3*



MONTGOMERY AL 361

19 MAR 2007 PM 4 L

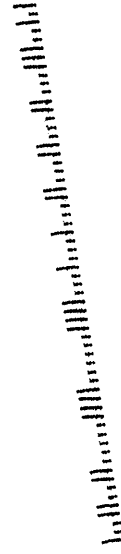
Partney Board #208921 01-29A

EASTERLING CORRECTIONAL FACILITY

200 WALLACE DRIVE

CLIO, ALABAMA 36017

District Court For Middle District  
 P.O. Box 711  
 Montgomery, AL 36101



This correspondence is forwarded from an Alabama State Prison. The contents have not been evaluated, and the Alabama Department of Corrections is not responsible for the substance or content of the enclosed communication.